

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NUMBER 1:20CV66**

CARYN DEVINS STRICKLAND,)
)
Plaintiff,)
)
v.)
)
UNITED STATES OF AMERICA, et al.,)
)
Defendants.)

DEFENDANTS' INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendants provide these initial disclosures to Plaintiff. These disclosures are based on Defendants' present understanding of Plaintiff's allegations and claims as set forth in Plaintiff's Complaint and reflect the information reasonably available to Defendants at this time. Defendants reserve the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), as developments may warrant.

1. The Name and, If Known, the Address and Telephone Number of Each Individual Likely to Have Discoverable Information—Along with the Subjects of That Information—that the Disclosing Party May Use to Support Its Claims or Defenses, Unless the Use Would Be Solely for Impeachment

Name and Contact Information	Subjects of Discoverable Information
Peter Adolf 129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720 (Contact through Defendants' counsel)	Knowledge of events alleged in complaint
Heather Beam	Knowledge of events alleged in complaint

<p>401 West Trade St Charlotte NC 28202 704-350-7601</p> <p>(Contact through Defendants' counsel)</p>	
<p>Joshua Carpenter 129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720</p> <p>(Contact through Defendants' counsel)</p>	Knowledge of events alleged in complaint
<p>Cait Clarke 1 Columbus Cir., NE Washington, D.C. 20544 202-502-3060</p> <p>(Contact through Defendants' counsel)</p>	Knowledge of events alleged in complaint
<p>John Parke Davis 129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720</p> <p>(Contact through Defendants' counsel)</p>	Knowledge of events alleged in complaint
<p>James Ishida Lewis F. Powell, Jr. United States Courthouse Annex 1000 East Main Street, Richmond, Virginia 23219-3517 (804) 916-2700</p> <p>(Contact through Defendants' counsel)</p>	Knowledge of events alleged in complaint
<p>Jill Langley 1 Columbus Cir., NE</p>	Knowledge of events alleged in complaint

Washington, D.C. 20544 (303) 335-2975 (Contact through Defendants' counsel)	
Anthony Martinez Contact through: Missy Spainhour Constangy, Brooks, Smith & Prophete LLP 84 Peachtree Road Suite 230 Asheville, NC 28803 (828) 333-4218	Knowledge of events alleged in complaint
William Moormann 129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720 (Contact through Defendants' counsel)	Knowledge of events alleged in complaint

2. A Copy—or a Description by Category and Location—of All Documents, Electronically Stored Information, and Tangible Things That the Disclosing Party Has in Its Possession, Custody, or Control and May Use to Support Its Claims or Defenses, Unless the Use Would Be Solely for Impeachment.

Unless stated otherwise below, the categories of documents listed below are already in Plaintiff's possession and/or the possession of the Office of the Federal Public Defender for the Western District of North Carolina (129 West Trade St., Suite 300, Charlotte, NC 28202), the Administrative Office of the U.S. Courts (1 Columbus Cir., NE, Washington, D.C. 20544), and/or the United States Court of Appeals for the Fourth Circuit (1100 E Main St #501, Richmond, VA 23219). For purposes of these disclosures, the term "documents" includes electronically stored information.

1. Documents referenced in the Complaint.
2. Documents referenced in the Answer.
3. Documents referenced in, and/or submitted with, the parties' summary judgment briefing.
4. Documents concerning Plaintiff's participation in the Fourth Circuit's Employee Dispute Resolution process.
5. Any documents produced or provided by Plaintiff.

Dated: August 19, 2022

Respectfully submitted,

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Principal Deputy Assistant Attorney General

CARLOTTA P. WELLS
Assistant Branch Director

/s/ Joshua Kolsky
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Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that, on August 19, 2022, I served a copy of the foregoing by email on counsel for Plaintiff.

/s/ Joshua Kolsky _____